

257013

William B. Hendrix, Jr.
18662 Newberry Road
Blair, South Carolina 29015

NDI
2015-17-E

June 9, 2015

The Honorable Swain E. Whitfield
Public Service Commission
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: Parr Hydro Reservoir Re-licensing

Dear Swain:

As you know, South Carolina Electric and Gas is currently in the process of applying for a new license to operate the above-referenced project. As part of this process, there have been numerous public meetings and discussions. SCE&G has established a website, www.parrfairfieldrelicense.com, where one can access documents and information in regard to the re-licensing process.

SCE&G has filed its Pre-Application Document (PAD) and conducted a Joint Agency Meeting on April 14, 2015. As part of this process, all interested or affected parties have until June 15, 2015 to file any comments, or requests for further information or studies to be provided and conducted, that are not currently listed as part of the PAD. I am enclosing for your review, a request for further information and study that I am filing with SCE&G and the Federal Energy Regulatory Commission (FERC.) In attending numerous meetings and reviewing all available information, it appears that SCE&G did not necessarily abide by all of the guidelines established in the original license issued for the Project by FERC. I am requesting that SCE&G produce information in regards to the establishment of the Project's Boundary Line or conduct a study reviewing the process that was conducted to insure its compliance with FERC Guidelines.

I would appreciate any support of my request that you might convey to SCE&G. Letters can be forwarded to:

Mr. William R. Argentieri, P.E.
Manager of Civil Engineering
South Carolina Electric & Gas Company
220 Operation Way
Mail Code A221

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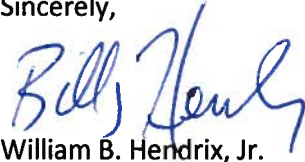
Cayce, SC 29033-3701

Mr. Henry Mealing
Kleinschmidt Associates
204 Caughman Farm Lane, Ste. 301
Lexington, SC 29072

While the deadline to submit information and study requests is June 15, 2015, there is no deadline for submitting letters in support of such requests. I would be more than happy to discuss any of the information in my request, or this project in general. I can be reached at 803-404-0711.

Thanking you in advance for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Billy Hendrix", written over the printed name.

William B. Hendrix, Jr.

William B. Hendrix, Jr.
18662 Newberry Road
Blair, South Carolina 29015

June 9, 2015

Mr. William R. Argentieri, P.E.
Manager of Civil Engineering
South Carolina Electric & Gas Company
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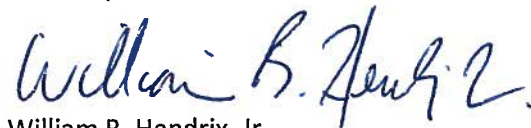
Mr. Henry Mealing
Kleinschmidt Associates
204 Caughman Farm Lane, Ste.301
Lexington, South Carolina 29072

Re: FERC Project 1894 Relicensing

Dear Sirs:

Pursuant to Code of Federal Regulations (18 C.F.R. 16.8(b) (5), attached please find request for information and study request.

Sincerely,

A handwritten signature in blue ink that reads "William B. Hendrix, Jr." in a cursive style.

William B. Hendrix, Jr.

(I) IDENTIFICATION OF INFORMATION TO BE PROVIDED AND STUDY TO BE PERFORMED

The Pre-Application Document (PAD) that South Carolina Electric & Gas (SCE&G) has submitted to the Federal Energy Regulatory Commission (FERC) for the re-licensing of this Project is inaccurate and incomplete. The PAD does not accurately describe or reflect the actual Project Boundary Line (PBL) that was established for the Project or the actual length of the project. The PBL that was established by SCE&G does not comply with the guidelines and directives established by FERC when the license was issued. In addition, the survey method that was used to delineate the PBL is not in compliance with FERC's license. Requestor is asking that any and all information and documentation regarding the establishment of the PBL be provided. This information should contain, but not be limited to: (1) complete copies of any studies conducted by, or on the behalf, of SCE&G in regards to the establishment of the PBL, (2.) copies of any amendments to Exhibit J or Exhibit K that have been made since the issuance of the License for this Project, (3.) copies of any correspondence or documents between SCE&G and FERC in regards to SCE&G acquiring additional land beyond what was required in the license that was issued for the project, and (4.) Copies of any FERC Orders or correspondence approving the acquisition of additional lands other than as required in the original license. Lacking the production of the above-referenced documentation and information, requestor asks that a new study be undertaken to determine how, and upon what criteria, SCE&G established the PBL. This new study will determine whether or not the PBL was established in accordance with FERC regulations and was carried out with FERC's approval. This study would include the production of a true elevation survey of the PBL for the project.

(II) IDENTIFICATION OF BASIS FOR DETERMINATION

The license issued authorizing this Project by FERC on August 28, 1974, provides very specific guidelines as to what property is to be acquired for the project and included within the Project's Boundary. "Finally, Interior requested that recreational lands extend a minimum of 200 horizontal feet from the high water mark. We are requiring Applicant to acquire in fee shoreline lands up to the 270-foot contour or up to 50 feet horizontal measure from the 266-foot contour, whichever is greater, on Parr Reservoir...this license condition will provide a strip of land 50 to 200 feet in horizontal measure along these reservoirs. "(Pages 19 and 20 of license. *Exhibit 1*)

"We do not preclude the possibility of requiring Applicant to acquire additional lands for recreational purposes in the future. At this time, however, with the exception of those areas of intensive recreational use heretofore considered, we believe the acquisition of a strip of land 50

to 200 feet in width around the Monticello and Parr Reservoirs adequately protects the public interest.” (Page 20 of license. *Exhibit 1*)

“Article 48. Licensee shall purchase in fee and include within the project boundary all lands necessary or appropriate for project operations, including lands for recreational use and shoreline control. The lands encompassed by the project boundary shall include, but not be limited to:

.... (b) Shoreline lands up to the 270-foot contour or up to 50-feet, horizontal measure, from the 266-foot contour of the lower reservoir, whichever is greater:....Provided, That the project boundary except with respect to land necessary or appropriate for recreational purposes, shall not exceed 200 feet, horizontal measure, from the 266-foot or the 425-foot contour, unless satisfactory reasons to the contrary are given:” (Page 44 of license. *Exhibit 2*)

These guidelines for acquiring lands for the project are also reflected in the PAD that SCE&G has currently filed with FERC for the relicensing of this project. “Article 48: License shall purchase in fee and include within the project boundary all lands necessary or appropriate for project operations, including lands for recreational use and shoreline control. The lands encompassed by the project boundary shall include, but not be limited to:...(b) Shoreline lands up to the 270-foot contour or up to 50-foot horizontal measure from the 266-foot contour of the lower reservoir, whichever is greater:... Provided that the project boundary except with respect to land necessary or appropriate for recreational purposes, shall not exceed 200 feet, horizontal measure, from the 266-foot or the 425-foot contour, unless satisfactory reasons to the contrary are given.” (Page 3-12 and 3-13 – Pre-Application Document, January 2015 *Exhibit 3*) “Article 48 of the Project License issued in 1974 required that SCE&G purchase in fee and include within the Project boundary...shoreline lands up to the 270-foot contour, or 50 feet (measured horizontally) from the Parr Reservoir’s 266-foot contour, whichever is greater...Provided that the Project Boundary, except with respect to land necessary or appropriate for recreational purposes, shall not exceed 200 feet, horizontally measured from the 266-foot...” (Section 3, Page 8 – Shoreline Management Plan Parr Reservoir, September 2014. *Exhibit 4*) “SCE&G owns all lands or obtained flowage rights within the Project boundary surrounding Parr Reservoir. As noted, this area is referred to as the “Buffer Zone” and may encompass an area up to the 270-foot contour or measuring up to 50 feet but no greater than 200 feet horizontally from the 266-foot contour on Parr Reservoir, whichever is greater.”(Section 3.2, Page 10 – Shoreline Management Plan Parr Reservoir, September 2014. *Exhibit 5*)

In reality the land acquisition that was done for property determined to be within the project boundary of this project was not based on the guidelines spelled out in the license issued by FERC, and was instead based on the Broad River’s 100 year flood of record. Exhibit K

documents for this project reflect the large discrepancy between what was required by FERC as a condition of the license and what SCE&G actually acquired. "Notes: 2. The P.B.L. around Parr Reservoir is generally along the flood of record as adjusted for the influence of Parr Dam, as indicated on table this sheet" (SCE&G Exhibit K-Sheet 1. Exhibit 6) "Elevation of Project Boundary Line (Minimum) Based on Flood of record (224,000 CFS) in river with Fairfield built but not operating. All spillway gates fully down." (SCE&G Exhibit K-Sheet 1. Exhibit 7) The flood of record for this area occurred in 1928 and 1929 with waters reaching an elevation of 285' – 19' above the current crest level of the dam and the Maximum Reservoir Operating Level (Full Pool) (Parr Hydroelectric Project P-1894 – Table of Standard Project Numbers.) and 16.5 'above the Maximum Rated Capacity of the dam's spillway. The Exhibit K documents have numerous notes and wording in reference to the elevation level of the reservoir that are not based on the license and in fact contradict the license requirements. These notes also contradict information that is in the PAD that is currently before FERC for approval:

- (1.) "THE FLOOD LINE ELEVATIONS UP HELLER'S CREEK SHALL BE AT ELEVATION 278.3. THE P.B.L. CANNOT BE LESS THAN THIS ELEVATION, ARTICLE 48 OF THE LICENSE IS APPLICABLE."
- (2.) "ARTICLE 48 OF LICENSE IS APPLICABLE. HOWEVER, WHEN FLOWS EXCEED THE 270' CONTOUR THEN THE FLOW ELEVATION SHOWN ON SECTION LINES WOULD APPLY."
- (3.) "THE FLOOD LINE ELEVATIONS UP ENOREE RIVER SHALL BE AT ELEVATION 275.3. THE PBL CANNOT BE LESS THAN THIS ELEVATION. ARTICLE 48 OF THE LICENSE IS APPLICABLE."
- (4.) "ALL P.B.L. SHALL BE RUN IN STRAIGHT LINE SEGMENTS EQUAL TO OR SLIGHTLY GREATER THAN THE ELEVATIONS SHOWN." (*Exhibit 8*)

While the license does state that there is the possibility of acquiring additional lands if "satisfactory reasons to the contrary are given," or such lands were "necessary or appropriate for project operations," there has been no record of any such reasons being presented to FERC by SCE&G or of FERC approving any additional land acquisition other than that authorized under the original license. SCE&G would be hard pressed to justify the acquisition of lands 19' above the crest level of the dam, which they obviously have no means of controlling, as "necessary or appropriate for project purposes." While SCE&G has claimed to have filed revised Exhibits F & K in 1981, and to have received approval of these revisions by FERC Order dated August 19, 1981, they have been unable or unwilling to produce copies of said documents. SCE&G informed Requestor on May 27, 2015 that "they consider this matter closed and are unwilling to expend additional time and resources retrieving documents." (*Exhibit 9*)

The current Exhibit K documents on file have a reference note, "This Exhibit drawing was originally issued....as part of the Application for Amendment of License made on June 26, 1981." Requestor has been informed by FERC personnel that they have no record of any Application for Amendment. The land that SCE&G acquired for this project extends anywhere from an elevation of 270' up to elevations as high as 285' – 19' above the crest level of the dam and the project's Maximum Reservoir Operating Level and 16.5' above the Maximum Rated Capacity of the dam's spillway. SCE&G maintains their land acquisition was based on a United States Geological Survey (USGS) study. This in itself would seem to establish, and be an admission, that the acquisition was not done in accordance with the requirements of the FERC license as there is no reference in the license, or any subsequent filings, to the use or need of such a study. When Requestor initially asked SCE&G for copies of this study he was told by the Company's Manager of Civil Engineering, William Argentieri, "We've been looking for a copy of that study for years." Later the same day (October 30, 2014) that the request for a copy of the study was made, Requestor received an e-mail from Argentieri stating, "Good news, even though I cannot find the final report, the USGS backwater study drawings have enough information on them to help us understand the reasoning used to determine the location of the Parr Reservoir project boundary line." (*Exhibit 10*) In a subsequent meeting to discuss this "good news", requestor was shown two engineering profile sheets supposedly showing the elevations of the PBL as it related to the water flows during the flood of record in the Broad River. The sheets were unsigned and had no engineering seals. When asked for narrative or pertinent data information that was produced in conjunction with the study, Requestor was told that SCE&G had no such information. Incredibly, SCE&G now wants Requestor and the general public, to blindly accept that the thousands of acres of land that were acquired for this project was based and according to a study that they have no copy of, or are unwilling to produce. It would seem that whatever study was apparently done, it was not in conjunction with establishing the PBL. The two sheets supplied to Requestor, have revision dates much later than the recording dates of the deeds acquiring lands within the PBL. Negotiations for these land acquisitions were initiated well before the dates on the sheets and it would certainly take a suspension of disbelief to think that the PBL was not established well before the signing and recording of deeds. It seems more likely that this USGS study, if actually fully conducted, was not done so in conjunction with the establishment of the PBL, but instead with regard to issues that were discovered well after the land acquisition process was complete. The use of "Straight Line Segments" to establish the PBL is in direct conflict with the license requirements. All references to establishing the PBL in the license call for horizontal measures from the established elevation. SCE&G has previously admitted that this practice was not in compliance with the methods prescribed in the license, and have deeded property back to landowners as a result of this non-compliance.

(III) RESOURCE ISSUES AND GOALS/OBJECTIVES FOR THESE RESOURCES

The land acquisition process that SCE&G conducted as part of this project resulted in hundreds of acres of land being unnecessarily acquired. Large tracts of these lands were never intended for project purposes and have instead been utilized as exclusive hunting property, which includes a boat landing on the Broad River, for SCE&G employees, retirees and their political operatives. Unlike the rest of the property acquired for this project, all the land acquired above the SC Rte. 34 Bridge over the Broad River was never placed into the State of South Carolina's Department of Natural Resources game management program. SCE&G has placed posted signs on the property and it has been used exclusively for hunting by their operatives. In a period of time where they have yearly sought rate increases from their customers, SCE&G has spent tens of thousands of dollars, if not more, maintaining the properties for hunting. (*Exhibit 11*) It should also be noted that these properties are located from 13 to 15 miles from the dam of this project. All of SCE&G's presentations and documents that have been filed, including Exhibit K, relicensing website and the PAD, continue to refer to the reservoir as being 13 miles long -in reality it is 15 miles long. (Presentations dated 9/19/2012 & 1/20/2013- Parr Hydroelectric Project Hydrologic Data - Parr Reservoir (full) 13 miles long- Joint Agency/Public Meeting dated 4/14/15) The acquisition process that was conducted for this project has resulted in countless landowners being unnecessarily deprived of the resources and benefits of their property. These resources and benefits are now being enjoyed by SCE&G and its employees. SCE&G corporately benefits through the harvest of timber on the property that was acquired, and SCE&G employees get the benefit of a free hunt club. Prior to being acquired by SCE&G, these lands provided a source of income not only for the landowners, but the numerous individuals living in the Western Part of Fairfield County who were employed in timber, hunting and farming activities. Ironically, these individuals having lost all benefit of these lands, are now as customers of SCE&G, in the position of having to finance the upkeep of the property they lost to SCE&G's hunt club, as well as the Company's record corporate profits, through year after year of rate increases. Surely this was not what FERC had in mind when they established the elevation of the PBL of this project as being no more than 200 feet horizontal measure from the elevation of 266' - the elevation of 266' being the top of the crest gates of the dam and the Maximum Reservoir Operating Level (Full Pool.) The requested information and study will review whether or not the resources that are part of the land that was acquired for this project are being used for the purposes for which they were originally said to have been intended for and whether or not they would be best served by being returned to the original landowners.

(IV) STUDY METHODOLOGY/ALTERNATIVES

The issue of the establishment of the PBL has been completely ignored through the initial process of this re-licensing. There have been no discussions or studies done to address the issue. The majority of study requests that are proposed, are addressed to study issues downstream of the dam of this project. In light of SCE&G's lack of producing any concrete documentation substantiating how they went about acquiring land within the PBL of this project, it would seem only appropriate that as part of a relicensing process, a study be conducted to review the process that was initially conducted in regards to the land acquisition for this project. Such a study would certainly include a complete re-survey of the PBL based on true elevations and the horizontal measure there from. There is no other method available which would insure the accuracy and authenticity of the PBL.

(V) DOCUMENTATION OF STUDY METHODOLOGY AS GENERALLY ACCEPTED PRACTICE

Requestor is unaware of any method of establishing or confirming property lines other than through the use of a survey - as such, this would certainly be considered accepted practice.

(VI) EXPLANATION AS TO HOW INFORMATION/STUDY REQUESTED WILL BE USEFUL IN FURTHERING RESOURCE GOALS/OBJECTIVES

From the time the land acquisition for this project was conducted, until the present date, there have been lingering questions and doubts by the landowners effected, as to the legitimacy and need for the acquisitions. Three generations of landowners have had to live with the loss and use of their land. Livelihoods once supported through timber harvesting, row-cropping and hunting are no longer available. In their place, a well maintained hunt club for SCE&G employees, retirees and political operatives. This has been particularly bothersome to said landowners, as throughout the acquisition process, they were continuously advised by SCE&G representatives, that their land would be inundated once the project was complete and of no viable use to them. The reality could not be any further from the truth.

One would certainly assume, that through a re-licensing process such as the one currently being conducted for this project, any issues involving discrepancy's or questions, would be thoroughly re-examined and vetted. One would also assume that SCE&G would strive to make the re-licensing process as transparent and thorough as possible. Accordingly, the information and study requested above would insure that all land acquired for the project was done so in accordance with FERC regulations. If it is found that these regulations were not followed, they will provide a starting point for the return of lost resources to their rightful owners.

recommended for registration as National, Historical, Natural, or Environmental Education Landmarks. Interior did recommend against issuance of a license until an acceptable Exhibit S is filed. We believe the public interest will be better served by issuance of the license with provision for the filing of a revised Exhibit S pursuant to Article 54 of the license. Such a revised Exhibit S will be based on the results of the comprehensive long-term post operational monitoring programs which will determine the effects on fish and wildlife. The availability of this information will enable us to further protect and enhance fish and wildlife in the area as may be necessary or appropriate.

Interior also discussed the impact of the redeveloped Parr project on a potential downstream Federal development, known as the Frost Shoals Project. S. DOC. NO. 189, supra. We note that there is no present plan or schedule for construction of this facility.

Interior further objected to the inclusion of the 55 acres of islands in the Monticello Reservoir for future recreational use since 20 of these acres are within a proposed nuclear exclusion zone. Atomic Energy Commission regulations state that "activities unrelated to operation of the reactor may be permitted in an exclusion area under appropriate limitations, provided that no significant hazards to the public health and safety will result." 10 CFR §100.3(a) (1973). With appropriate safeguards we believe these islands may serve public recreational needs and are requiring their inclusion within the project boundary.

Interior stated that the 387-acre recreational parcel adjacent to Fairfield Powerhouse is inappropriate for recreational development due to the limited recreation capability of Monticello and Parr Reservoirs, lack of public access, proposed restricted public use of the Fairfield tailrace, transmission lines, railroad right-of-way, and steep and hilly topography. We are reserving decision on the suitability of the 387-acre recreational parcel pending the completion of a study which will compare the recreational advantages and disadvantages of this site and the 187-acre recreational parcel heretofore noted with possible subimpoundments on Cannon's and Heller's Creeks.

Finally, Interior requested that recreational lands extend a minimum of 200 horizontal feet from the high water mark. We are requiring Applicant to acquire in fee shoreline lands up to the 270-foot contour or up to 50 feet horizontal measure from the 266-foot contour, whichever is greater, on Parr

Reservoir and shoreline lands up to the 430-foot contour or up to 50 feet horizontal measure from the 425-foot contour, whichever is greater, on Monticello Reservoir. This license condition will provide a strip of land 50 to 200 feet in horizontal measure along these reservoirs.

We do not preclude the possibility of requiring Applicant to acquire additional land for recreational purposes in the future. At this time, however, with the exception of those areas of intensive recreational use heretofore considered, we believe the acquisition of a strip of land 50 to 200 feet in width around the Monticello and Parr Reservoirs adequately protects the public interest. Other comments submitted by Interior have been addressed in the Final Environmental Impact Statement and considered by this Commission.

The U.S. Department of Agriculture, Forest Service (Forest Service) transmitted with its letter dated December 20, 1973, a Memorandum of Agreement between the Forest Service and the Applicant providing, in part, for the interests of the Forest Service. The details of this agreement have been heretofore noted. The Forest Service also suggested that a detailed development plan for the 300-acre subimpoundment be drafted which would include a parking lot for a minimum of 40 cars. We have conditioned the license to require the filing of such a detailed plan within one year from the date of issuance of this license. Finally, the Department of Agriculture recommended that the entire area within the triangle bounded by State Route 215, relocated State Route 99, and County Road 347 be considered for dedicating to public recreation in connection with the Monticello Reservoir subimpoundment. We are requiring that the Applicant include such land in the feasibility study to be filed pursuant to Article 45.

By letter dated November 7, 1972, the U.S. Department of Health, Education, and Welfare commented on the health aspects of proposed recreational facilities and recommended that the plans for sanitary facilities be submitted to the South Carolina State Board of Health for approval. In Article 43 we have provided for the filing of a solid waste management plan approved by the appropriate State agency.

The U.S. Department of Transportation by letter dated November 9, 1972, noted that the enlargement of the Parr Project will have a minimal effect on the highway system but will require the relocation of portions of South Carolina Highway Route 99 and Route 215, both of which are included

Article 47. The Licensee shall, during the construction and operation of the project, continue to consult and cooperate with the Bureau of Sport Fisheries and Wildlife, the South Carolina Wildlife and Marine Resources Department, the South Carolina Pollution Control Authority, and other appropriate environmental agencies for the protection and development of the natural resources and values of the project area. The Commission reserves the right, after notice and opportunity for hearing, to require such reasonable changes in the project and its operation as may be found necessary or appropriate to preserve and promote the environment of the project area, as provided herein by Articles 11 and 14.

Article 48. Licensee shall purchase in fee and include within the project boundary all lands necessary or appropriate for project operations, including lands for recreational use and shoreline control. The lands encompassed by the project boundary shall include, but not be limited to:

(a) All islands formed by the 226-foot contour of the lower reservoir and by the 425-foot contour of the upper reservoir.

(b) Shoreline lands up to the 270-foot contour or up to 50-feet, horizontal measure, from the 266-foot contour of the lower reservoir, whichever is greater; and shoreline lands up to the 430-foot contour or up to 50-feet, horizontal measure, from the 425-foot contour of the upper reservoir, whichever is greater: Provided, That the project boundary except with respect to land necessary or appropriate for recreational purposes, shall not exceed 200 feet, horizontal measure, from the 266-foot or the 425-foot contour, unless satisfactory reasons to the contrary are given:

Provided further, That the project boundary in the area of the V. C. Summer Nuclear Station shall be the 425-foot contour, as shown on Sheet 8 (FPC No. 1894), Exhibit K. Licensee within one year after completion of land acquisition shall file an Exhibit F and, for Commission approval, a revised Exhibit K.

Article 49. Following consultation with the South Carolina Wildlife and Marine Resources Department, Licensee shall file for Commission approval within six months after the date of issuance of the license its plans for a study to determine suitable plant species which would be tolerant to

Article 43: Requirement for Licensee to consult and cooperate with the South Carolina Department of Health and Environmental Control, and comply with local regulations in planning and providing for the collection, storage, and disposal of solid wastes generated through public access and use of project lands and waters, and within one year after the commencement of operation of the Project, shall file with the Commission a solid waste management plan which has been approved by the Department of Health and Environmental Control. This plan shall provide (a) the location of solid waste receptacles to be provided at public areas including campgrounds, picnicking areas, and boat access areas; (b) schedules of collection for the above receptacles; (c) provisions for including in the subject plan any public use areas as they are developed; and (d) disposal sites and methods of disposal.

Article 44: Requirement for Licensee, following consultation and cooperation with the Bureau of Outdoor Recreation of the U.S. Department of the Interior; the South Carolina Wildlife and Marine Resources Department; the South Carolina Department of Parks, Recreation, and Tourism, shall study the feasibility of constructing recreation sub-impoundments (reservoirs with stable water surface elevations) with adjacent access or recreation areas at suitable locations on Cannon's and Heller's Creeks, or other arms of Parr Reservoir, in lieu of reserving and developing for recreational purposes the 180.5-acre parcel on Heller's Creek at County Road 28 and the 387-acre parcel opposite Fairfield Powerhouse, as shown on Exhibit R-3 (FPC No. 1894-45). Within one year following issuance of the license, Licensee shall file, for Commission approval, revisions of Exhibit R implementing findings of the study including, but not limited to, a schedule for development of (1) said 180.5-acre and 387-acre parcels for recreational purposes, or (2) said alternative recreation sub-impoundments and adjacent recreation areas for fishing, waterfowl hunting, sightseeing, and other uses. Such revisions of Exhibit R shall conform to the Commission's then existing Rules and Regulations, including the economic effect of such development on project operation.

Article 48: Licensee shall purchase in fee and include within the project boundary all lands necessary or appropriate for project operations, including lands for recreational use and shoreline control. The lands encompassed by the project boundary shall include, but not be limited to:

(a) All islands formed by the 266-foot contour² of the lower reservoir and by the 425-foot contour of the upper reservoir.

(b) Shoreline lands up to the 270-foot contour or up to 50-feet, horizontal measure, from the 266-foot contour of the lower reservoir, whichever is greater; and shoreline lands up to the 430-foot contour or up to 50-feet, horizontal measure, from the 425-foot contour of the upper reservoir, whichever is greater: Provided, that the project boundary except with respect to land necessary or appropriate for recreational purposes, shall not exceed 200 feet, horizontal measure, from the 266-foot or the 425-foot contour, unless satisfactory reasons to the contrary are given.

Provided further, that the project boundary in the area of V. C. Summer Nuclear Station shall be the 425-foot contour as shown on Sheet 8 (FPC No. 1894), Exhibit K. Licensee within one year after completion of land acquisition shall file an Exhibit F and, for Commission approval, a revised Exhibit K.

Article 50: Licensee, for the purpose of monitoring and determining the quality of the aquatic environment of Parr Reservoir and Monticello Reservoir, including the 300-acre sub-impoundment, so as to realize its full recreational potential, shall conduct a water quality monitoring program at selected locations for a period of five years from the date of commencement of project operation. Sampling shall be done at least monthly and include measurements of dissolved oxygen, pH, conductivity, temperature profiles, carbon dioxide, total dissolved solids, total alkalinity, total hardness, chloride sulfate, phosphate, nitrate, BOD, COD, heavy metals, silica, calcium, magnesium, sodium, and turbidity. Annual progress reports and, within one year following conclusion of the monitoring program, a final report shall be filed showing the findings of this program together with recommendations of any need for further sampling or for proposals for maintenance or improvement of the aquatic environment to such reservoirs as shown to be desirable by the studies.

Article 51: Requirement to monitor on a continuous basis dissolved oxygen, temperature, stream flow, conductivity and pH, and on a monthly basis, turbidity and heavy metals, at its water quality station in the Broad River downstream of Parr Reservoir. To assist the personnel of the Columbia, South Carolina, water treatment plant in the early detection of musty odors in Broad

² The current license identifies elevation 226' as the contour of the lower reservoir, however this is incorrect, as the top of the crest gates are at elevation 266'.

3.0 HISTORY OF THE SHORELINE MANAGEMENT PLAN

Parr Reservoir is formed by the Parr Shoals Dam ("Dam"), which was originally constructed between 1912 and 1914. The Dam is situated across the Broad River and houses a 14.88 megawatt (MW) hydroelectric facility, located in an integral powerhouse. On August 28, 1974, the Federal Power Commission (FPC), predecessor to the FERC, issued SCE&G a new operating License for the Parr Shoals Development. In addition to relicensing the existing facilities, the new License authorized the construction of the 511.2 MW Fairfield Pumped Storage Development. This resulted in the creation of the Fairfield Development's upper pool, Monticello Reservoir. The new License also authorized the enlargement of the existing Parr Reservoir to serve as the lower pool to the Fairfield Development. This involved raising the height of the Dam approximately 9 feet, thereby nearly doubling Parr Reservoir's surface area. The construction of newly licensed facilities was completed in 1978, with the facilities beginning commercial operation that same year (F.P.C., 1974). The newly developed Project, including both Parr and Fairfield Developments, was subsequently referred to as the Parr Hydroelectric Project.

Article 48 of the Project License issued in 1974 required that SCE&G purchase in fee and include within the Project boundary: the islands in the Parr and Monticello Reservoirs formed by the 266-foot and 425-foot contour intervals, respectively; shoreline lands up to the 270-foot contour, or 50 feet (measured horizontally) from the Parr Reservoir's 266-foot contour, whichever is greater; and, shoreline lands up to the 430-foot contour interval, or 50 feet (measured horizontally) from Monticello Reservoir's 425-foot contour, whichever is greater. Provided that the Project boundary, except with respect to land necessary or appropriate for recreational purposes, shall not exceed 200 feet, horizontally measured, from the 266-foot or the 425-foot contour, unless satisfactory reasons to the contrary are given. This area is referred to as the "Buffer Zone". The FPC determined that acquiring these lands would provide SCE&G with adequate shoreline control around the reservoirs, in addition to serving the purposes of Project operation and recreation (F.P.C., 1974).

Furthermore, Article 20 of the Project License orders that SCE&G allow public access, to a reasonable extent to Project waters and adjacent Project lands (with the exception of lands necessary for the protection of life, health, and property) for navigation and outdoor recreational

Monticello Reservoir is included under separate cover), while adhering to the historical management goals agreed to and developed with agencies and stakeholders.

In addition to an updated SMP for each Project reservoir, a Permitting Handbook was developed in consultation with stakeholders and agencies to address activities requiring consultation with and/or permits from SCE&G. These activities include, but are not limited to the following: shoreline stabilization, access path development, and other shoreline activities. SCE&G will review the Permitting Handbook with interested stakeholders periodically to evaluate its effectiveness; however, SCE&G may make changes to the permitting process at any time as it determines in its sole judgment to be necessary and appropriate.

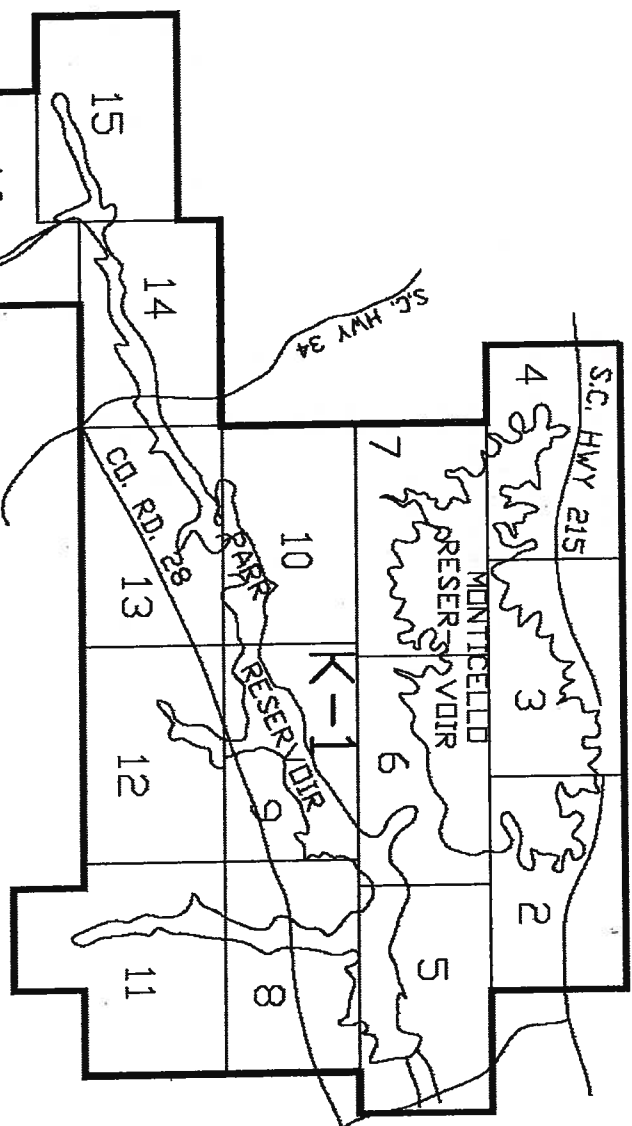
3.2 PROJECT BOUNDARY

SCE&G owns all lands or obtained flowage rights within the Project boundary surrounding Parr Reservoir. As noted, this area is referred to as the "Buffer Zone" and may encompass an area up to the 270-foot contour or measuring up to 50 feet but no greater than 200 feet horizontally from the 266-foot contour on Parr Reservoir, whichever is greater.

3.3 ~~ACREAGE OF PROJECT LANDS~~ (SECTION TO BE MOVED TO TABLE UNDER SECTION 5.0)

NOTES:

1. ON THE MONTICELLO RESERVOIR & SUB-IMPONDMENT THE PROJECT BOUNDARY LINE IS GENERALLY A MAXIMUM OFF 200' FROM THE 425' CONTOUR EXCEPT IN RECREATIONAL AREAS OR DEEMED NECESSARY BY FIELD INSPECTION. (SEE 'K' SHEETS 2-20 FOR DETAILS)
2. THE P.B.L. AROUND PARR RESERVOIR IS GENERALLY ALONG THE FLOOD OF RECORD AS ADJUSTED FOR THE INFLUENCE OF PARR DAM, AS INDICATED ON TABLE THIS SHEET.
3. ALL LANDS WITHIN THE PROJECT BOUNDARY LINE ARE OWNED IN FEE SIMPLE BY SOUTH CAROLINA ELECTRIC AND GAS COMPANY, UNLESS OTHERWISE SHOWN ON K-2 THRU K-17.
4. PROJECT BOUNDARY LINE IS NOT SHOWN ON THIS SHEET, EXCEPT IN RECREATIONAL AREAS, BUT IS SHOWN IN DETAIL ON SHEETS K-2 THRU K-20.
5. ELEVATIONS SHOWN CORRECTED ACCORDING TO RECENT SURVEY BASED ON U.S.C.&G.S.(M.S.L.)
6. SOUTHERN R.R. R/W IS EXCLUDED FROM PROJECT, EXCEPT TO THE EXTENT OF FLOWAGE RIGHTS. (SEE EXHIBIT 'F').
7. NO TREES ARE TO BE CUT ON AREAS INDICATED AS ISLANDS OR RECREATIONAL AREAS.
8. CO-ORDINATES SHOWN ARE BASED ON THE STATE GRID SYSTEM.



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S.C. HWY 34

COL. RD. 28

MONTICELLO
RESERVOIR

K-1

LAND ATLAS
KEY MAP

SUBER CREEK

N520,000

56	55	54	53	52	51	50	49	48	47	46	45	44	43
----	----	----	----	----	----	----	----	----	----	----	----	----	----

PROJECT BOUNDARY LINE ELEVATIONS FOR PARR RESERVOIR
(MINIMUM)

USGS STATION NO.	DISTANCE FROM PARR DAM (FT.)	ELEVATION OF PROJECT BOUNDARY LINE (MINIMUM)	BASED ON
1	100	270.0	
2	1,000	270.0	
3	3,000	270.0	
4	6,000	270.8	
5	7,800	271.3	
6	9,850	272.1	
7	12,300	272.8	
8	14,600	274.1	
9	15,500	274.3	
10	17,700	275.3	
11	20,400	275.8	
12	22,700	276.7	
13	25,600	277.4	
14	30,600	279.2	
15	32,700	279.7	
16	35,300	270.0	
17	37,400	270.0	
18	40,100	270.0	
19	42,600	270.0	
20	45,300	270.0	
21	48,100	270.0	
22	49,800	270.0	
23	51,000	270.0	
24	53,000	270.0	

Flood of record
(224,000 CFS) in
river with Fairfield
built but not operat-
ing. All Spillway
Gates fully down.

40,000 CFS in
river and all Fair-
field units operating;
all Spillway Gates
fully down. (Table
4-A)5-21-74.

TO BE USED
AS A GUIDE IN
ESTABLISHING THE
P.B.L., HOWEVER,
IN NO CASE WILL
THE P.B.L. BE LESS
THAN THE REQUIRE-
MENT IN ARTICLE
48.

END OF PROJECT'S
INFLUENCE



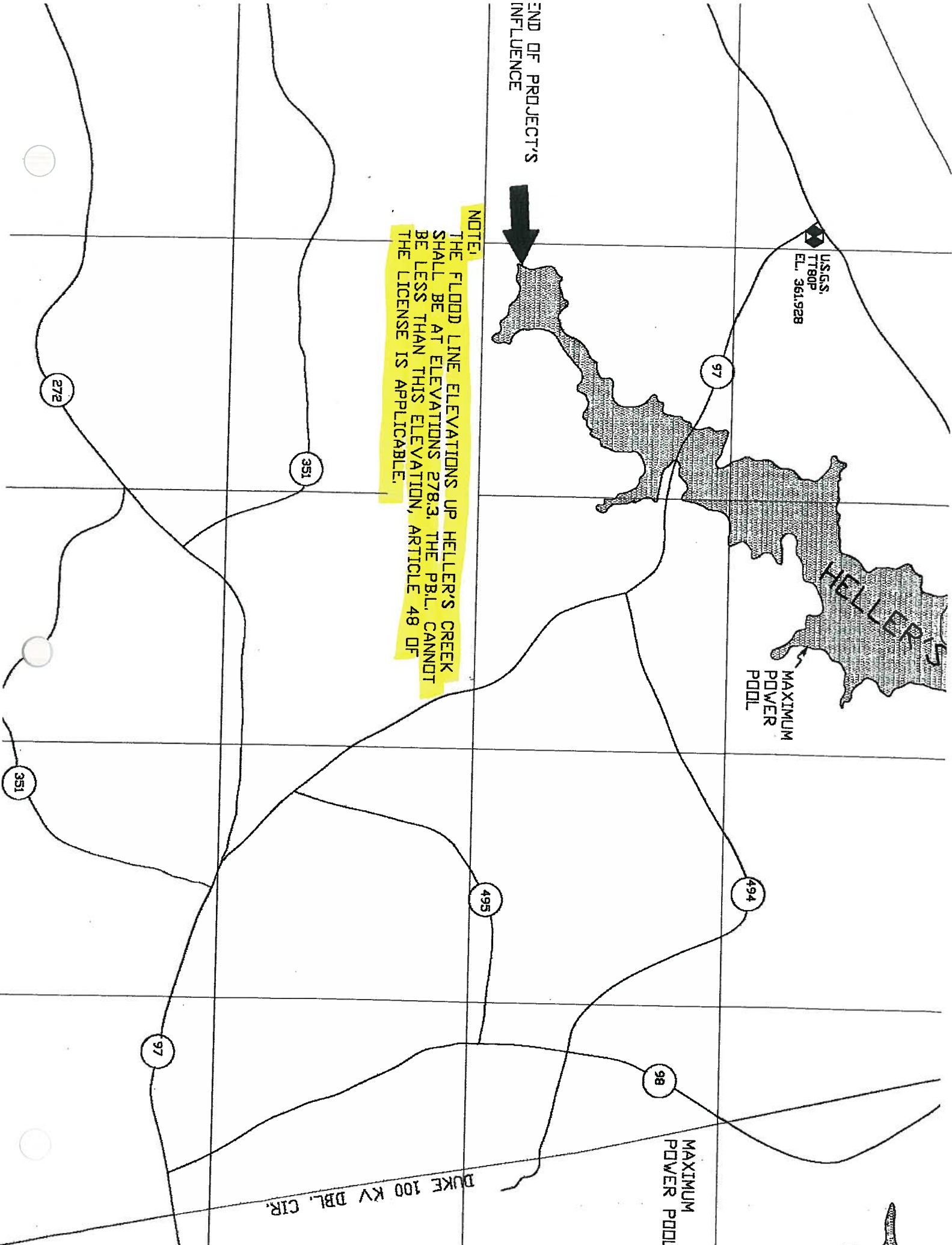
NOTE:
THE FLOOD LINE ELEVATIONS UP HELLER'S CREEK
SHALL BE AT ELEVATIONS 278.3, THE P.B.L. CANNOT
BE LESS THAN THIS ELEVATION, ARTICLE 48 OF
THE LICENSE IS APPLICABLE.

U.S.G.S.
TT80P
EL. 361.928

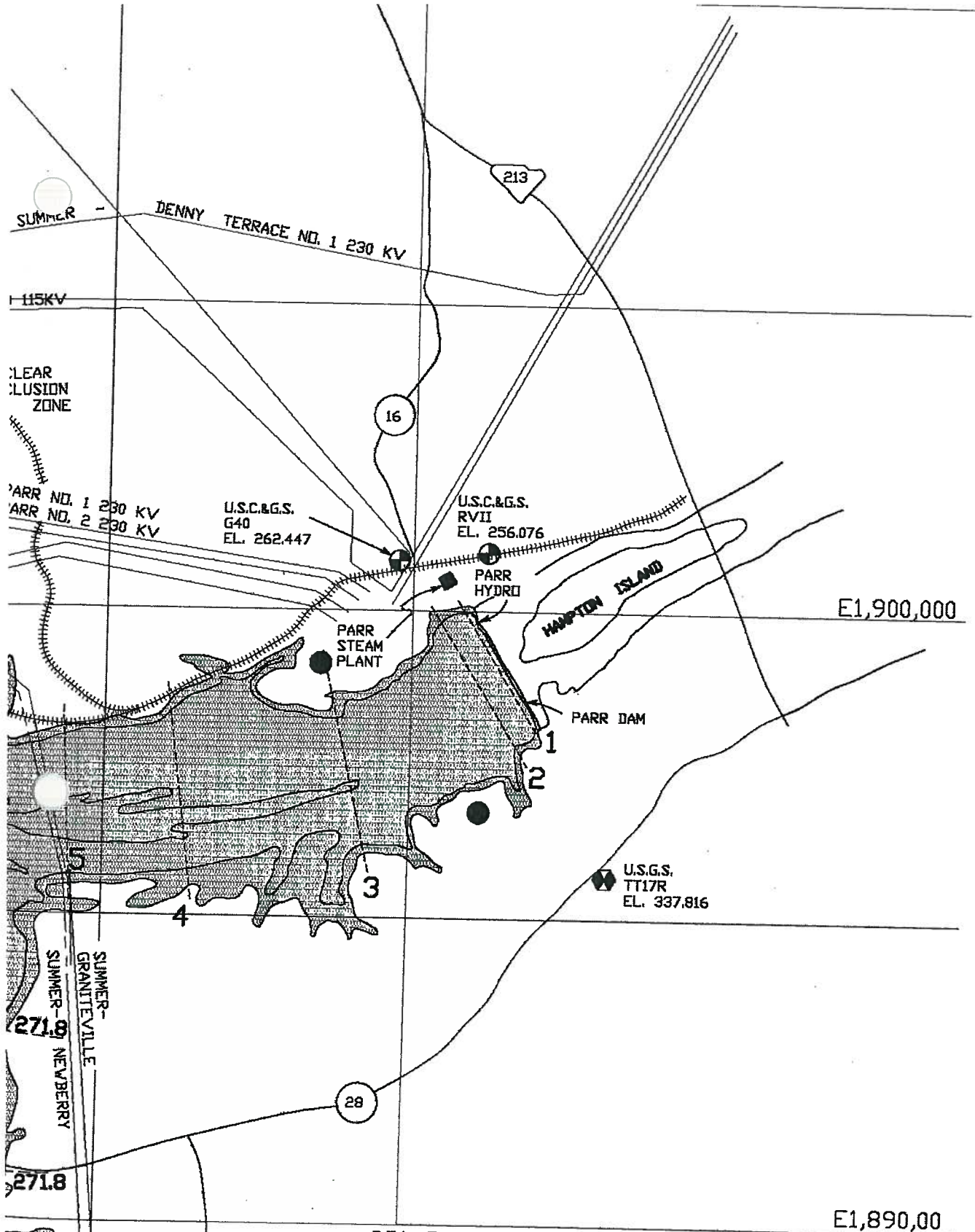
HELLER'S
MAXIMUM
POWER
POOL

MAXIMUM
POWER
POOL

DUKE 100 KV DBL. CIR.

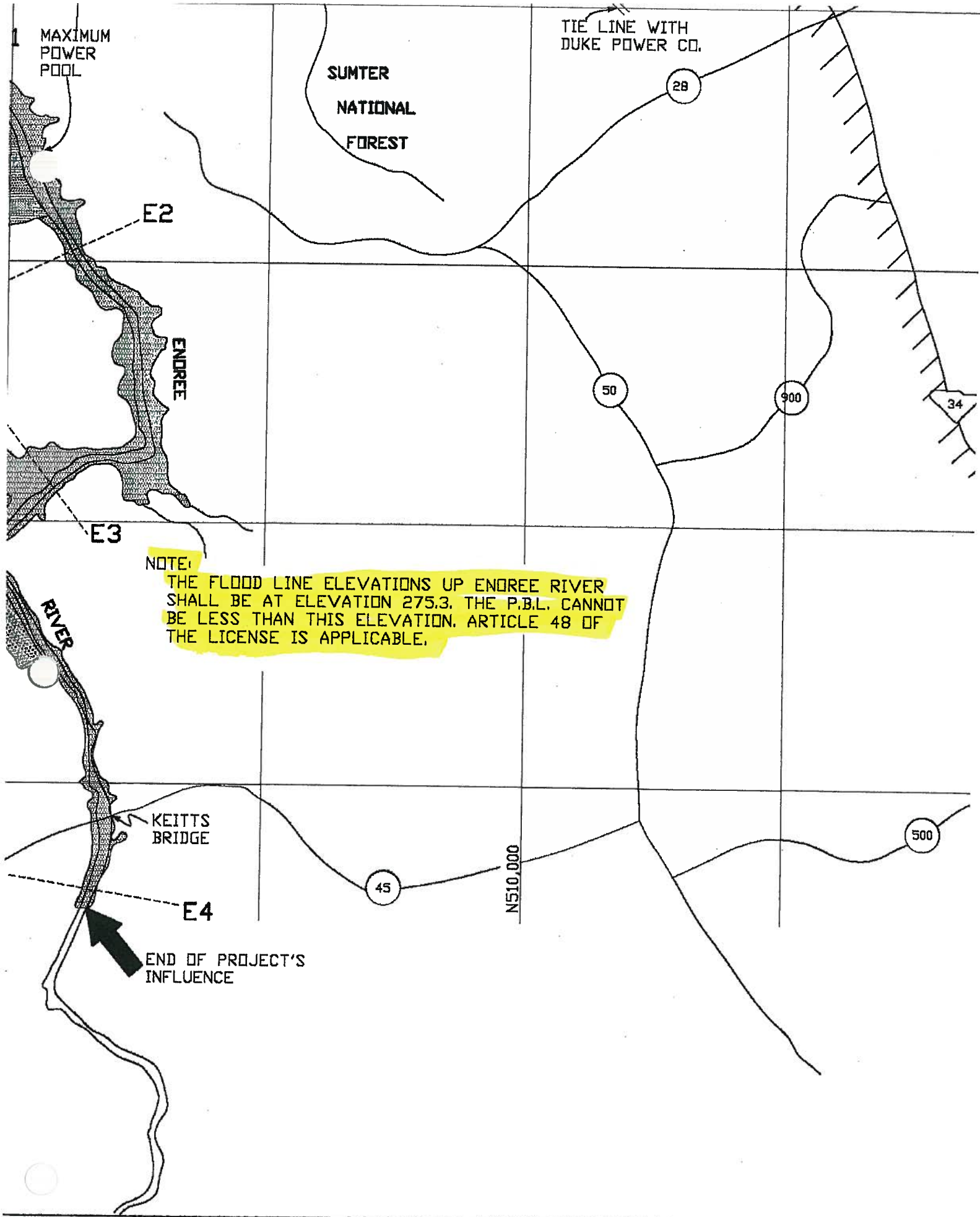


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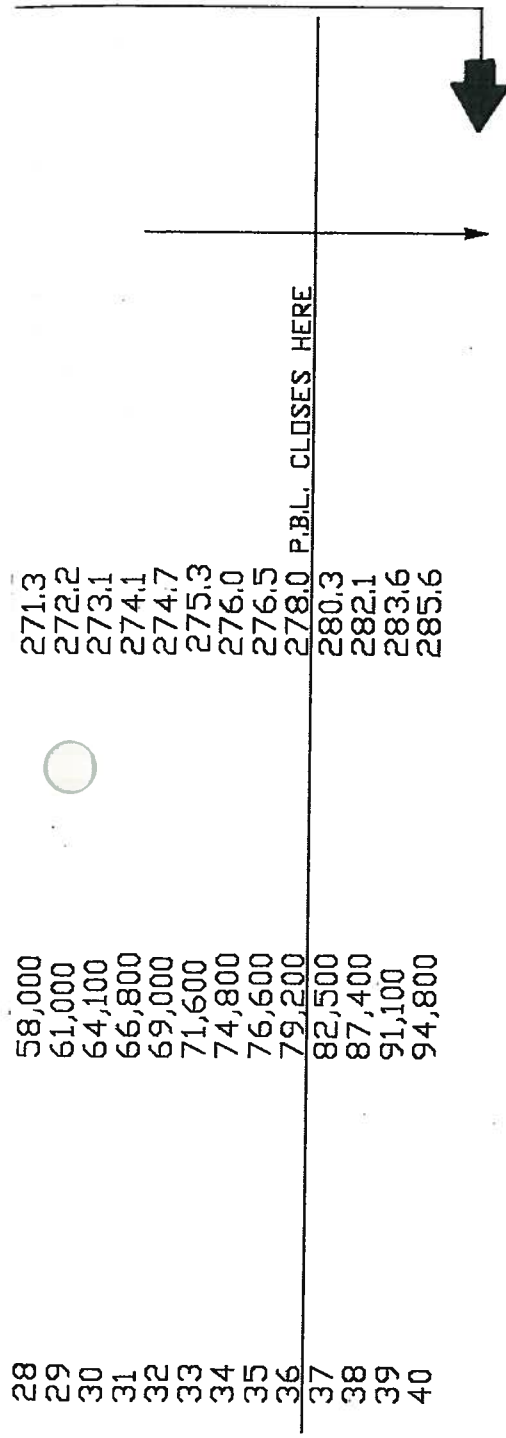


P.B.L. FOR CANNON'S CREEK

- 1)a. ELEVATIONS SHOWN ON LINES C1 THROUGH C8 ARE FLOWS FOR MEAN ANNUAL FLOOD ON CANNON'S CREEK DURING OCTOBER 1929 FLOOD ON BROAD RIVER.
- b. ELEVATIONS SHOWN ON LINES C9 & C10 ARE FLOWS FOR 50 YEAR FLOOD ON CANNONS CREEK DURING MEAN ANNUAL FLOOD ON BROAD RIVER.
- 2)a. ELEVATIONS FOR FLOWS WERE OBTAINED FROM U.S.G.S. BACKWATER PROFILE STUDY.(TABLE 4) DATED FEBRUARY 1974.
- b. ARTICLE 48 OF LICENSE IS APPLICABLE. HOWEVER, WHEN FLOWS EXCEED THE 270' CONTOUR THEN THE FLOW ELEVATION SHOWN ON SECTION LINENS WOULD APPLY.



NOTE:
THE FLOOD LINE ELEVATIONS UP ENDREE RIVER
SHALL BE AT ELEVATION 275.3. THE P.B.L. CANNOT
BE LESS THAN THIS ELEVATION. ARTICLE 48 OF
THE LICENSE IS APPLICABLE.



ARTICLE 48 OF THE F.P.C. LICENCE STATES THAT ON THE PARR RESERVOIR, WE SHALL OWN IN FEE AND INCLUDE WITHIN THE P.B.L. ALL LANDS UP TO THE 270 FOOT CONTOUR OR UP TO 50 FEET, HORIZONTAL MEASURE, FROM THE 266 FOOT CONTOUR, WHICHEVER IS GREATER. ALL P.B.L. SHALL BE RUN IN STRAIGHT LINE SEGMENTS, EQUAL TO OR SLIGHTLY GREATER THAN ELEVATIONS SHOWN. HOWEVER, THE P.B.L. SHALL NOT EXCEED 200' FEET, HORIZONTAL MEASURE, FROM THE 266 FOOT CONTOUR UNLESS IT CAN BE JUSTIFIED.

Federal Acreage Occupied by the Project Boundary			SCE&G Owned
Drawing No.	Tract No.	Federal Acreage (Flowage Easement)	Section 24 Lands (Fee Simple)
K-14	193	-	72.14
K-17	198	17.88	
K-15/16	200	120.55	25.35
K-14	211	-	26.13
K-13	213	-	28.26
K-10/13	214	-	390.65
K-17	226	3.09	-
K-16/17	227	12.52	-
K-17	232	3.14	-
K-17	248	0.33	-
K-17	264	0.93	-



May 27, 2015

Mr. William B. Hendrix, Jr.
18662 Newberry Road
Blair, South Carolina 29015

Re: South Carolina Electric & Gas Company
Parr Hydroelectric Project
FERC Project No.1894
Response to letter dated May 4, 2015

Dear Mr. Hendrix:

I am responding to your letter dated May 4, 2015 requesting additional information concerning the Federal Energy Regulatory Commission's (FERC) establishment of the Project boundary line (PBL) of the Parr Reservoir. As noted in my previous letter dated March 18, 2015, the Company considers establishment of the PBL fully resolved. The Company has acquired all property rights along the shores of the Parr Reservoir and its tributaries which remain necessary for the operation and maintenance of FERC Project No. 1894. There is no reason to revisit the matter as the reservoir was established in conformity with the specific obligations set forth in the Project's license and has been approved by FERC. Moreover, even if the Company were to see a need in the future to reexamine the placement of the PBL, any property removed from the PBL with the FERC approval would then become non-Project lands and precluded from the jurisdiction of the FERC. In reference to your request for various documents, we must respectfully decline that request. We consider this matter closed and are unwilling to expend additional time and resources retrieving documents for you on this matter.

If you have any further questions, please contact me at (803) 217-9162 or bargentieri@scana.com.

Very truly yours,

William Argentieri, Manager Civil Engineering
Fossil/Hydro Technical Services

c: H. E. Delk, Jr./PH File
J. H. Hamilton/ J. Stuckey

Hendrix, William B.

From: ARGENTIERI, WILLIAM R <BARGENTIERI@scana.com>
Sent: Thursday, October 30, 2014 4:47 PM
To: Hendrix, William B.; Jeffrey Carter
Cc: BOOZER, THOMAS C; COLLINS, SCOTT E
Subject: Parr PBL

Billy and Jeff,

Good news, even though I cannot find the final report, the USGS backwater study drawings have enough information on them to help us understand the reasoning used to determine the location of the Parr Reservoir project boundary line. I know you will be unavailable next week, but would you like to get together again sometime during the weeks of November 10 or 17 to discuss what I found? If so, maybe you could give me a couple of dates and times you will be available and I will see what works for Tommy, Scott and I. If it is okay with you, we can meet at Tommy's office again.

Let me know what works for you.

Thanks,

William R. Argentieri
South Carolina Electric & Gas Company
Mail Code A221
220 Operation Way
Cayce, SC 29033-3701

(Physical Address)
100 SCANA Pkwy
Building A, Floor 2
Cayce, SC 29033-3712

Phone - (803) 217-9162
Fax - (803) 933-7849
Cell - (803) 331-0179













